

EXHIBIT 11



HENRY I. WILLETT III
Direct Dial: 804.697.4130
Direct Fax: 804.697.6130
E-mail: hwillett@cblaw.com

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VIA ELECTRONIC MAIL

Lawrence E. Laubscher Jr.
1160 Spa Road, Suite 2B
Annapolis, Maryland 21403
llaubscher@laubscherlaw.com

Kenneth S. McLaughlin, Jr.
1 E. Benton Street, Suite 301
Aurora, Illinois 60505
kmclaughlin@ma-lawpc.com

Re: *Emerson Creek Pottery, Inc. v. Countryview Pottery Co., et al.*
Case No. 6:20-cv-0054-NKM

Dear Larry and Ken:

Following up on my prior letters dated October 6, 8, and 26, 2021, as well as our communications after the deposition of Mr. Wehrli, we still have not received a response regarding Defendants' discovery deficiencies. As you have no doubt seen from the documents produced by Lindsay Winkler and Jonathan Domanus, there are literally hundreds of emails between Defendants and Lindsay Winkler and Jonathan Domanus from 2015 through, most recently, the Fall of 2021. Nevertheless, Defendants have still failed to produce a single email. This is obviously an egregious abuse of the discovery process and needs to be addressed with the court as soon as possible. Please let me know by the end of the day on Thursday, November 11, 2021, whether Defendants will cooperate and produce the emails that are in their possession.

Additionally, following the deposition of David Demiduk, you committed to providing certain financial documents that still have not been produced, including, but not limited to, any financials for events, and this delay has prejudiced Plaintiff. Accordingly, I also ask that you let me know by the end of the day today whether these documents will be produced and precisely when they will be produced.

Lastly, there are numerous references to marketing related materials in the production from Lindsay and Jonathan that have not been produced. Please also let us know if these documents will be produced.

Sincerely,



Henry I. Willett III

HIW/aas: #2788675

cc: Garfield Goodrum, Esq. (via electronic mail)